

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE; and
MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; CHAD F. WOLF, in
his official capacity as Acting
Secretary of the United States
Department of Homeland Security;
and MATTHEW ALBENCE, in his
official capacity as Acting Director of
U.S. Immigration and Customs
Enforcement,

Defendants.

Civil Action No. 1:20-cv-11283-ADB

**BRIEF OF AMICUS CURIAE UNIVERSITY OF PITTSBURGH
IN SUPPORT OF PLAINTIFFS' COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF**

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STATEMENT OF AMICUS CURIAE

The University of Pittsburgh – of the Commonwealth System of Higher Education (the “University” or “Pitt”), founded in 1787, is one of the oldest and most distinguished institutions of higher education in the United States. The main campus of the University is located in Pittsburgh, Pennsylvania, with four regional campuses in Bradford, Greensburg, Johnstown, and Titusville. With over 200 years’ development, the University is composed of 17 undergraduate and graduate schools and colleges. The University currently serves approximately 30,000 students in total, including close to 3,500 international students. It is consistently ranked among the top recipients of federal research grants in the nation and is the only “Research I” state-related institution in Western Pennsylvania.

The University has a long-standing tradition of international engagement that spans more than fifty years and is rooted in Western Pennsylvania’s immigrant past. In 1968, Pitt moved to coalesce its faculty and research assets with the establishment of the University Center for International Studies. This move allowed faculty, staff, and students from all undergraduate colleges, graduate and professional schools, and regional campuses to work together and share international expertise across academic fields. The University's interest in international engagement is additionally highlighted by its wide-ranging study abroad offerings coordinated by the Study Abroad Office. Pitt provides support for its international students through the Office of International Services. Additionally, in the center of its Pittsburgh campus, the University’s celebration of international diversity is exhibited in physical form in the

University's thirty "Nationality Rooms," which collectively highlight the legacy of Pittsburgh's ethnic diversity while raising money used to support students' cross-cultural experiences with scholarships to travel to the countries represented by each of heritage rooms.

Pitt is also home to four international academic associations with worldwide memberships: the Association for Slavic, East European and Eurasian Studies; the Comparative and International Education Society; the Latin American Studies Association; and the European Union Studies Association. These regional and thematic study centers offer grants to bolster Pitt faculty research on international topics, including support for overseas research travel and conference participation.

Overall, Pitt attracts more than 6,000 international students, faculty, staff and visiting scholars from over 100 countries annually, and international students are critical to the Pitt community and to the University's missions and strategic goals. For these reasons, the University is committed to ensuring that, during this ongoing global emergency, international students are given the same opportunities as their domestic counterparts to study, research, and participate as part of the University community.

INTRODUCTION

A university campus is an intensely social environment that, by design, supports close interactions and large group gatherings. The University of Pittsburgh, together with other universities and colleges throughout the United States, is facing an unprecedented challenge—performing our vital mission and protecting our community in the midst of a worldwide pandemic. The University’s guiding principles in navigating this challenge have included taking all necessary steps to minimize risk to our community while seeking to continue our primary mission of educating, performing vital research, and serving the local community.

Since the closure of the University’s campus in March, the University’s senior leadership has taken an “all hands-on deck” approach to thoughtfully plan for resuming campus activities in the Fall 2020 semester.¹ These plans were developed by various committees and working groups over the course of multiple months resulting in the announcement in late June of the University’s adoption of a hybrid approach comprised of both online and in-person education. This framework was informed, in part, by the existence of the March 13, 2020 announcement by the U.S. Department of Homeland Security (“DHS”) that international students would no longer be required to attend in-person classes for the duration of the COVID-19

¹ See Donovan Harrell, *All Hands on Deck to Plan Possible Return to Campus this Fall*, <https://www.utimes.pitt.edu/news/all-hands-deck-plan>

pandemic.² On July 6, 2020, however, DHS suddenly reversed itself to revoke the March 13 Guidance without warning or explanation.³

Although the University will not be a remote-only campus in the fall, as it has adopted a flexible hybrid framework for the upcoming school year, the July 6 Directive still brings with it onerous and unreasonable requirements. If the University is forced to move from its carefully drafted plan, it places the University's international students at risk of irreparable harm. This unjustified decision also has the effect, and seems to have the intention, of disrupting international education in the United States. After decades of investment and careful stewardship in creating world-class programs, a severe disruption to the global talent pipeline would cause immediate and potentially sustained damage to the quality and reputation of the graduate programs, faculty retention, and undergraduate instruction at institutions of higher education nationwide. Therefore, we ask that this Court enjoin Defendants from enforcing the July 6 Directive and reinstate the March 13 Guidance.

ARGUMENT

I. INTERNATIONAL STUDENTS ARE ABSOLUTELY VITAL TO THE UNIVERSITY COMMUNITY AND TO THE UNIVERSITY'S EDUCATIONAL AND RESEARCH MISSIONS

The University of Pittsburgh prepares leaders to shape the world by embracing and impacting humanity. In doing so, it must connect globally, encourage

² U.S. Immigration and Customs Enforcement, *COVID-19: Guidance for SEVP Stakeholders* https://www.ice.gov/sites/default/files/documents/Document/2020/Coronavirus%20Guidance_3.13.20.pdf (March 13, 2020) (hereinafter "March 13 Guidance")

³ *Broadcast Message: COVID-19 and Fall 2020* <https://www.ice.gov/doclib/sevis/pdf/bcm2007-01.pdf> (July 6, 2020) (hereinafter "July 6 Directive")

engagement, foster collaboration, and promote diversity and inclusion. These goals not only benefit from, but require the skills, contributions, perspective and meaningful interaction of international students. International students bring a variety of crucial contrivances to the University of Pittsburgh, which is why the University's five-year strategic plan specifically contemplates the goals of promoting diversity and inclusion and embracing the world as a whole.⁴

The current worldwide pandemic serves as a timely reminder of the critical importance of Pitt's international community. For example, multiple international post-doctorate fellows in the University's Center for Vaccine Research are presently hard at work researching and developing a vaccine for COVID-19.⁵ In addition to vaccine research, international students and faculty play integral roles on various research teams in both the Schools of Medicine and Pharmacy as well as the Graduate School of Public Health. These teams are currently working on multiple research projects that directly and indirectly address the challenges posed by the pandemic, such as data analysis of the growing cohort of COVID-19 patients in the University of Pittsburgh Medical Center's Intensive Care Unit. At this very moment, as we face an unprecedented global threat that has killed hundreds of thousands of people, the University of Pittsburgh views its international students as a critical asset, fortunate to have those working on vital pandemic-related research, while the July 6 Directive makes clear that DHS views these same individuals as a liability. Attempts by DHS

⁴ See The Plan for Pitt https://www.pitt.edu/sites/default/files/Strategic-Plan-Presentation_0.pdf

⁵ Researchers at Pitt Working to Safely and Quickly Develop COVID-19 Vaccine (Feb. 27, 2020), <https://pittsburgh.cbslocal.com/2020/02/27/university-of-pittsburgh-coronavirus-vaccine/>

to make it more difficult for international students at universities nationwide to contribute to critical projects like these does a disservice not only to the students themselves, but potentially to humanity at large.

Beyond research initiatives like those highlighted above, international students also bring important diversity into classrooms, University athletics, and the Pittsburgh community at large. Two-thirds of Pitt's international student population are graduate students attracted to Pitt's high-ranking programs in fields such as nursing, law, engineering, and computer and information sciences. In fact, international students make up for the majority of graduate students at the University. In Political Science, well over half (currently 60%) of Pitt's PhD students are international students. The Masters of Information Science program is Pitt's largest graduate program overall, and is historically made up of 75-85% international students. The Dietrich School of Arts and Sciences has maintained its share of approximately 40% international students from over 70 countries. And according to the Associate Dean for Graduate Studies at Pitt's School of Medicine, an estimated 25% of the 310 PhD students currently registered in the School of Medicine hold F-1 student visas. Furthermore, 69% of our incoming Masters class at the School of Business, 90% in Statistics, 66% in Physics and Astronomy and half of the graduate students in Philosophy, Biology, and Chemistry are international.

The University also has approximately 60 international student athletes on various teams within the University's Athletics Department. These athletes strengthen their teams and contribute to the school spirit that is fostered through

university athletics. Pitt symbiotically offers international student athletes the opportunity to thrive in their respective goals and life paths by providing a healthy, safe place to pursue academic endeavors. The July Directive could have the potential of completely ending a student athlete's career and further professional development opportunities.

Finally, international students are vital to the larger Pittsburgh community. They enrich the community through the contribution of a wide array of varying cultures. Additionally, international students undoubtedly play a huge role in the local economy, contributing in excess of \$283,300,000 annually to Pittsburgh alone.⁶ The undeniable value of the diversity fostered by international students is precisely the reason for why Pitt has committed in its strategic plan to promote diversity and inclusion and to embrace the world. Accordingly, to remain silent in the face of the July 6 Directive would undermine the University's core values.

II. THE UNIVERSITY AND ITS INTERNATIONAL STUDENTS SUBSTANTIALLY RELIED ON ICE'S MARCH 13 GUIDANCE

A. The University has invested considerable financial and human resources in designing and putting in place a comprehensive operational plan for the upcoming academic year.

On March 11, 2020, based on the increasing number of COVID-19 cases and consistent with the recommendations of an overwhelming majority of medical experts, the University shut down nearly all in-person educational offerings in an

⁶ Vibrant Pittsburgh, *Pittsburgh Region Immigrants and Internationals Fact Sheet and Resources* https://www.allegenycounty.us/uploadedFiles/Allegheny_Home/Dept_-Content/County-Executive/pghregionimmigrants.pdf.

effort to minimize the spread of COVID-19.⁷ This decision was consistent with President Trump’s national emergency declaration issued on March 13, 2020.⁸ The same day President Trump declared COVID-19 a national emergency, United States Immigration and Customs Enforcement (“ICE”), a division of DHS, recognizing the threat of the virus, announced that students in the country on certain non-immigrant student visas (“F-1” visas) would no longer be required to attend most classes in person and, instead, would be permitted to attend classes remotely.⁹ The government made clear that this exception was based on COVID-19 and would remain “in effect for the duration of the emergency.”¹⁰

Since March 2020, the University has enlisted a series of committees and working groups to address the pandemic and evaluate options for reopening campus for the upcoming Fall 2020 semester, including the Emergency Operations Center, the Healthcare Advisory Group, the Resilience Steering committee and the Provost’s Task Force on Reimagining a Pitt Education. In addition, the University formed various informal groups to address a slew of ancillary issues that have arisen since the pandemic began and has consistently been working with various medical and industry experts to assist in evaluating the considerations for safely returning students to the classroom. In sum, countless personnel have dedicated tens of thousands of hours to thoughtfully considering the current unprecedented challenge

⁷ COVID-19 Pandemic: Pitt’s Actions <https://www.chancellor.pitt.edu/spotlight/covid-19-pandemic-pitts-actions-0> (March 11, 2020).

⁸ Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak> (March 13, 2020).

⁹ March 13 Guidance.

¹⁰ *Id.*

in order to create a comprehensive plan for continuing to provide a top-tier education in the upcoming academic year.

As a result of these tireless efforts, the University developed a resilience framework with tiered operational postures¹¹ and a multitude of guidelines to accommodate the shifting nature of the pandemic.¹² Additionally, with regard to the Fall 2020 semester, the University announced in June that, after months of careful review, evaluation and preparation, it would utilize an adaptable hybrid on-campus and online educational model termed “Flex@Pitt.”¹³ This model is designed to maximize the possibility of in-person classroom activities (with very rigorous health and safety measures in place), while also taking into consideration the needs of community members whose personal health risk or circumstances might deter or prevent them from coming to the classroom.¹⁴ Consistent with these dual considerations, Flex@Pitt permits students to evaluate their own personal circumstances and decide whether to attend classes in person, remotely, synchronously, or asynchronously. For larger classes, students are to be separated into smaller cohorts to attend class in person on alternating days in order to permit for appropriate social distancing in each class.

The University estimates that the time and effort dedicated to meticulously addressing and planning for the pandemic has required the University to spend (or has otherwise lost) between \$40 and \$50 million on its efforts to address the

¹¹ <https://www.coronavirus.pitt.edu/return-campus/resilience-framework-operational-postures>

¹² <https://www.policy.pitt.edu/university-policies-and-procedures/covid-19-standards-and-guidelines>

¹³ <https://www.policy.pitt.edu/university-policies-and-procedures/covid-19-standards-and-guidelines>

¹⁴ <https://www.provost.pitt.edu/more-information-provost-about-flexpitt-and-classroom-experience>

pandemic, with sums even greater than that required to successfully implement Flex@Pitt in the fall. In short, addressing the challenges of the pandemic has been a difficult and costly endeavor that the University has successfully navigated through the utilization of a consistently thoughtful and comprehensive approach.

B. International students have relied substantially on the plan established by the University for the upcoming academic year.

The University has worked hard to diligently communicate to its students the process of addressing the pandemic since late February 2020, up to and including the plan for the upcoming academic year. Throughout the spring, the University consistently updated the students on this process and, in June, the University began communicating specific plans for the Fall 2020 semester, including the hybrid model Flex@Pitt.¹⁵ Ultimately, students received a multitude of communications regarding the plans for the fall in order to promote transparency and to foster increased certainty in a time of inherent uncertainty.¹⁶ Additionally, the Office of International Services (“OIS”) communicated directly with international students and created a webpage specifically pertaining to the impacts of COVID-19.¹⁷ Many international students, relying on these plans and the March 13 Guidance, have already expended considerable time and money with the expectation of being on-campus in the fall. Students have taken out loans, made travel arrangements, and signed housing contracts.

¹⁵ <https://www.chancellor.pitt.edu/spotlight/update-resiliency-planning>

¹⁶ See, e.g. <https://www.provost.pitt.edu/provost-messages-about-covid-19>; <https://www.chancellor.pitt.edu/spotlight>

¹⁷ See, e.g. <https://www.ois.pitt.edu/covid19>; <https://www.ois.pitt.edu/2020undergrad>;

https://mailchi.mp/e19e27f401aa/message-from-dean-bonner-cancellor-update-899574#new_tab

III. IMPLEMENTING THE JULY 6 DIRECTIVE WILL BE ONEROUS FOR THE UNIVERSITY TO IMPLEMENT AND CREATES UNCERTAINTY FOR INTERNATIONAL STUDENTS

A. The July 6 Directive requires the University to implement onerous requirements and disrupts months of planning.

When outlining plans for the upcoming year, relying on the government's promise that the March 13 Guidance would remain in effect throughout the duration of the pandemic, the University did not foresee the need for a specific contingency plan for F-1 students should it need to abandon its Flex@Pitt model. The University and its international students, however, were blindsided with the July 6 Directive, which announced that international students would, again be required to attend classes in person. While the Flex@Pitt educational model, which is inherently adaptable to various scenarios, will mitigate the potential challenges created by the July 6 Directive, there are still a host of onerous requirements of the directive that will force the University to divert extensive time and resources to address.

The July 6 Directive imposes numerous requirements on the University in unreasonably short timelines. First, the University will be required to file a report with the Student and Exchange Visitor Program regarding the operational plans for the Fall 2020 semester no later than August 1, 2020. Second, the University is required to update and re-issue the Form I-20, "Certificate of Eligibility for Nonimmigrant Student Status," for each of the 3,500 international students at the University no later than August 4, 2020. Third, the University is required to verify that all of its international student in the United States is taking a "minimum number" of online-only courses or, alternatively, terminate the records of students

who do not meet this criterion. The time and effort necessary to fulfill these requirements is incalculably large, which is especially challenging now, when pandemic-related burdens are already stretching normal workloads to maximum levels.

Since March 2020, the University has expended countless hours and tens of millions of dollars to meticulously address and plan for the pandemic. Despite this, the federal government, without cause or explanation, reversed its promise to maintain the F-1 exception “for the duration of the emergency” and introduced countless onerous requirements. The University will do absolutely everything necessary and within its power to fulfill these requirements and to offer the requisite number of in-person classes in order to ensure our international students can continue to pursue their studies in the United States. But the fact that the University is required to move mountains to achieve this end, despite already having spent months of time and millions of dollars to map out a thoughtful plan for the upcoming academic year further highlights the absurdity of the July 6 Directive.

B. The July 6 Directive unnecessarily creates uncertainty and anxiety for international students.

The government’s unjustified mandate that F-1 students physically return to the classroom in the fall, without any acknowledgement of the still-worsening pandemic, introduces great uncertainty and anxiety for international students. Even ignoring the obvious ethical concerns surrounding the forced return to the classroom of F-1 students in the middle of a worldwide pandemic, accommodating every

international student in person for the requisite portion of their course load presents a host of logistical concerns.

Flex@Pitt already contemplates splitting classes into cohorts to attend classes in person on an alternating basis, but this plan assumes a certain number of students will decide, for various reasons, not to attend any classes in person. Forcing the University to depart from its plan would likely increase the required number of in-person sessions, necessitating an increase in the total number of person-to-person contacts, which, in turn, would increase the chances students, faculty, and staff, would contract and further spread COVID-19.

As COVID-19 cases and deaths continue to increase nationwide, it is more important now than ever for universities to take care to ensure the health and safety of their employees and students. While Flex@Pitt entails rigorous safety standards and adaptability permitting the University to accommodate its students, if universities are pressured into prematurely reopening on an unreasonable scale, the potential health implications for students, faculty, and staff could be severe.¹⁸ The uncertainty associated with the July 6 Directive, which brings with it increased risks and scenarios in which students may feel they are presented with impossible choices, is unnecessary and undermines the reasonable reliance of both universities and students on the March 13 Guidance.

¹⁸ See Coronavirus Disease 2019 (COVID-19): *Considerations for Institutions of Higher Education*, available at: <https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html> (last accessed July 12, 2020).

IV. THE JULY 6 DIRECTIVE IS ARBITRARY AND CAPRICIOUS IN VIOLATION OF THE ADMINISTRATIVE PROCEDURES ACT

The Administrative Procedures Act (“APA”) provides discretion to agencies to implement guidance related to the laws those agencies enforce, but it does not permit guidance to be arbitrary and capricious. *See 5 U.S.C. § 706.* The July 6 Directive is arbitrary and capricious because it: (1) fails to consider the important aspects of the problem before it, and (2) fails to offer any reasoned basis that could justify the policy.

A. ICE fails to consider the important aspects of the problem before it, including the substantial reliance interests of the University and its international students.

The July 6 Directive “fail[s] to consider . . . important aspect[s] of the problem” before it. *Motor Vehicle Mfrs. Assn. of United States, Inc. v. State Farm Mut. Automobile Ins. Co.*, 462 U.S. 29, 43 (1983). Not only does the July 6 Directive fail to examine the significant effects it will have on the University, it also fails entirely to consider the grave dilemma imposed upon international students nationwide faced with the potentially devastating effects. This failure to consider important aspects of the problem is exacerbated by the fact that the July 6 Directive does not account for the reliance of universities and international students on the March 13 Guidance.

The Supreme Court has recently emphasized that “[w]hen an agency changes course . . . it must ‘be cognizant that longstanding policies may have engendered serious reliance interests that must be taken into account.’” *Department of Homeland Sec. v. Regents of the Univ. of Calif.*, No. 18-587, 2020 WL 3271746, at *14 (U.S. June 18, 2020) (quoting *Encino Motorcars, LLC v. Navarro*, 136 S. Ct. 2117, 2126 (2016)). As explained in detail above, the University and its international students

substantially relied on the flexibility granted by ICE’s March 13 Guidance, which was announced to be “in effect for the duration of the emergency.” That emergency, caused by COVID-19, undoubtedly continues and is even worse today,¹⁹ yet ICE, with no regard for the enormous reliance interests it created, abruptly reversed course and changed its policy with its July 6 Directive in violation of the APA.

B. ICE fails to offer any reasoned basis to justify the policy.

The July 6 Directive is arbitrary and capricious because it fails to articulate *any* basis, much less a reasonable basis, for its change in policy. At the time ICE released its March 13 Guidance, it seemed to recognize the threat posed by the pandemic to colleges and universities in general, and to international students in particular. It provided that “for the duration of the emergency” students holding nonimmigrant visas could attend classes remotely, all while retaining their visa status. *See* March 13 Guidance. The Guidance further indicated that the government would “continue to monitor the COVID-19 situation and [would] adjust its guidance as needed.” *Id.*

At the very least, ICE’s change in policy requires a reasoned basis for its departure from prior guidance, which it has entirely failed to provide. This is especially true in light of the fact that the March 13 Guidance was justified by the COVID-19 pandemic, which, by nearly every metric, is worse in the United States today than it was on March 13.²⁰ When asked about this illogical shift in policy, the

¹⁹ Campbell Robertson & Sarah Mervosh, *Pittsburgh Seemed Like a Virus Success Story. Now Cases Are Surging.*, The New York Times (July 12, 2020), <https://www.nytimes.com/2020/07/12/us/coronavirus-pittsburgh-pennsylvania.html>

²⁰ <https://www.cbsnews.com/news/coronavirus-cases-usa-63000-daily-record/>

White House, through its spokesperson, simply stated, “I think the policy speaks for itself . . . you don’t get a visa for taking online classes from, let’s say, University of Phoenix. So why would you if you were just taking online classes, generally?”²¹ This defense fails to acknowledge the ongoing and worsening nature of the pandemic and it is completely inconsistent with the reason ICE announced the exception in the first place. Indeed, the federal government has no justification for its failure to follow through on its promise that the exception would remain “in effect for the duration of the emergency.”

Further undermining the notion that the July 6 Directive is justified, just days after the directive was released, the government announced a separate proposed rule which would block immigrants from seeking asylum in the United States based on “potential international threats from the spread of pandemics.”²² Per its own admission in this proposed rule, COVID-19 remains a “catastrophic global pandemic.” *Id.* The government’s July 6 Directive, however, makes no mention of the ongoing public health emergency despite the fact that the very guidance it seeks to revoke – the March 13 Guidance – was entirely predicated upon the (then-less-severe) COVID-19 pandemic. In short, the government fails to offer any reasoned basis for the July 6 Directive, and all available evidence only serves to further undermine the policy change, rendering it arbitrary and capricious.

²¹ <https://www.whitehouse.gov/briefings-statements/press-briefing-press-secretary-kayleigh-mcenany-7-8-2020/>

²² <https://s3.amazonaws.com/public-inspection.federalregister.gov/2020-14758.pdf>

CONCLUSION

For the reasons stated above and in Plaintiffs' motion, the University respectfully requests that this Court enjoin Defendants from enforcing the policy announced in ICE's July 6 Directive and reinstate the March 13 Guidance.

Dated: July 13, 2020

Respectfully submitted,

Amicus Curiae
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